

Appendix B

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Trial Witnesses

Custodian Name	Custodian Proposed or Added	On Plaintiffs' Witness List	On Google's Witness List	Google Issued Hold	First Deposition	Litigation Hold Delay (days)¹	Total Produced Chats
Neal Mohan	11/20/2019	Expect to Call	Expect to Call	4/27/2023	11/19/2020	1254	5
Scott Sheffer	11/20/2019	Expect to Call	Expect to Call	2/3/2021	07/20/2021	441	9
Jerry Dischler	11/20/2019	Expect to Call	Not on List	1/22/2021	09/28/2020	429	20
Chris LaSala	2/20/2020	Expect to Call	Not on List	1/22/2021	10/20/2020	337	61
Duke Dukellis	2/20/2020	Expect to Call	Not on List	1/22/2021	08/11/2021	337	69
Jason Spero	2/20/2020	Expect to Call	Not on List	1/22/2021	09/28/2021	337	49
Payam Shodjai	2/20/2020	Expect to Call	Not on List	1/22/2021	11/10/2020	337	25
Dan Taylor	2/20/2020	Not on List	Expect to Call	1/22/2021	09/17/2021	337	119
Alok Verma	8/3/2020	Expect to Call	Not on List	1/22/2021	07/21/2021	172	73
Aparna Pappu	8/3/2020	Expect to Call	Not on List	1/22/2021	08/11/2023	172	157
Bryan Rowley	8/3/2020	Expect to Call	Not on List	1/22/2021	07/27/2021	172	2
George Levitte	8/3/2020	Expect to Call	Not on List	1/22/2021	08/10/2021	172	137
Jim Giles	8/3/2020	Expect to Call	Not on List	1/22/2021	11/06/2020	172	67
Max Loubser	8/3/2020	Expect to Call	Not on List	1/22/2021	04/21/2021	172	41
Scott Spencer	8/3/2020	Expect to Call	Not on List	1/22/2021	08/12/2021	172	46
Woojin Kim	8/3/2020	Expect to Call	Not on List	1/22/2021	03/30/2021	172	35
K. Marco Hardie	1/24/2023	Not on List	Expect to Call	4/3/2023	11/14/2023	69	7
Sarah Stefaniu	1/24/2023	Not on List	Expect to Call	4/3/2023	N/A	69	8
Jessica Mok	1/24/2023	Not on List	May Call	2/23/2023	11/10/2023	30	28
Ali Nasiri Amini	1/15/2021	Expect to Call	Not on List	2/3/2021	11/14/2023	19	71
Nirmal Jayaram	1/15/2021	Expect to Call	Expect to Call	1/22/2021	09/17/2021	7	162
Vlad Sinaniyev	1/15/2021	Deposition Designated	Not on List	1/22/2021	11/16/2023	7	53
Pooja Kapoor	11/20/2019	Not on List	May Call	10/4/2019	N/A	0	14
Adam Stewart	1/24/2023	Not on List	Expect to Call	3/8/2021	N/A	0	73
Martin Pal	1/24/2023	May Call	Not on List	1/22/2021	N/A	0	297
Sissie Hsiao	11/20/2019	Expect to Call	May Call	10/4/2019	12/09/2021	0	130
Bonita Stewart	11/20/2019	Expect to Call	Not on List	10/4/2019	05/17/2021	0	19

¹ This column shows the number of days that the “Custodian Proposed or Added” date precedes the “Google Issued Hold” date.

Custodian Name	Custodian Proposed or Added	On Plaintiffs' Witness List	On Google's Witness List	Google Issued Hold	First Deposition	Litigation Hold Delay (days)	Total Produced Chats
Brad Bender	11/20/2019	Expect to Call	Not on List	10/4/2019	10/16/2020	0	37
Donald Harrison	11/20/2019	Expect to Call	Not on List	10/4/2019	10/19/2021	0	12
Eisar Lipkovitz	8/3/2020	Expect to Call	Not on List	6/22/2020	03/31/2021	0	3
Jonathan Bellack	8/3/2020	Expect to Call	Not on List	10/4/2019	10/02/2020	0	56
Tim Craycroft	1/24/2023	Expect to Call	Expect to Call	9/20/2022	08/15/2023	0	14
Rahul Srinivasan	1/24/2023	Expect to Call	Not on List	1/22/2021	08/08/2023	0	149
Sam Cox	8/3/2020	Expect to Call	Not on List	10/4/2019	10/26/2020	0	31
Nitish Korula	2/16/2021	Expect to Call	Expect to Call	10/4/2019	10/28/2021	0	1226